

**Before the
Federal Communications Commission
Washington DC 20554**

In the Matter of)	
)	
Comprehensive Review of Universal Service Fund)	WC Docket No. 05-195
Management, Administration, and Oversight)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	
)	
Schools and Libraries Universal Service)	CC Docket No. 02-6
Support Mechanism)	

**Reply Comments of the Wisconsin Council on Library and Network
Development (COLAND)**
(Filed December 19, 2005)

The Wisconsin Council on Library and Network Development (COLAND) respectfully submits these reply comments in response to the above Notice of Proposed Rulemaking. Our reply comments are targeted at the Schools and Libraries Universal Service Support Mechanism, more commonly known as the E-rate.

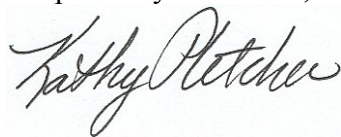
COLAND, appointed by the governor, functions as a forum through which librarians and members of the public identify, study, and collect public testimony on issues affecting Wisconsin libraries and other information services. COLAND's findings are communicated as advisory recommendations to the state superintendent of public instruction, the governor, and the state legislature.

COLAND strongly supports the initial comments filed by the American Library Association (ALA) for streamlining the E-rate application and fund disbursement process. We believe that the ALA's proposal to eliminate most forms will greatly benefit schools and libraries and increase participation in the program.

Unfortunately, from the public library perspective, Wisconsin has seen a steady decrease in their participation in the program over the past 4-6 years. Sixty percent of Wisconsin's 387 public libraries are in communities under 2,500 population. These libraries are often located in rural areas and are operated with very limited staff. With minimal budgets these small libraries would appear to be ideal candidates for the E-rate. But sadly very few apply. An onerous application process and a seemingly endless review process has discouraged all but the most resolute. We know of circumstances in which a library is seeking just \$400-\$600 in discounts on its phone bill. Yet the staff are harassed by endless requests for more documentation and repeated requests to justify every minor line item on their phone bills. This has alienated most library staff to the point where they give up and drop out of the program. We feel confident that if the Commission adopts the American Library Association's proposals that it will result in a dramatic increase in library participation which will directly benefit their communities.

Thank you for the opportunity to reply on this important docket.

Respectfully submitted,



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